

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:15-CR-558-D

v.

GREGORY BOWDEN
A.K.A "G"

DEPUTY CLERK

FACTUAL RESUME

Gregory Bowden ("Bowden"), the defendant, Brady Wyatt, the defendant's attorney, and the United States of America agree to the law and facts as follows:

ELEMENTS OF THE OFFENSE

In order to prove the offense alleged in Count One of the Superseding Information, that is, Use of a Facility of Interstate Commerce in Aid of a Racketeering Enterprise in violation of 18 U.S.C. §§ 1952(a)(2) and (B)(18 U.S.C. §§ 1591(a) and (b)(1)), the government must prove each of the following elements beyond a reasonable doubt:

**ELEMENTS OF
THE OFFENSE:**

In order to establish the offense alleged in Count One of the Superseding Information, the Government must prove the following elements beyond a reasonable doubt:

First: That the defendant used or caused to be used a facility in interstate or foreign commerce;

Second: That the defendant did so with the intent to commit a crime of violence to further unlawful activity; and

Third: Thereafter, the defendant did commit or attempt to commit a crime

of violence¹ to further unlawful activity.²

STIPULATED FACTS

In early 2014, Bowden met nineteen-year-old R.R. Not long after they met, Bowden invited R.R. to come and stay with him in Grand Prairie, Texas because she was having problems with her living situation. A short time later, Bowden told R.R. she needed to start making money for him engaging in commercial sex acts. He began posting advertisements for R.R. on the commercial sex website Backpage.com, and she engaged in commercial sex acts and gave Bowden the proceeds. Bowden took R.R. to various cities in Texas including Odessa, Abilene, Corpus Christi, Euless and Dallas, among others, and R.R. gave Bowden all the proceeds from her commercial sex acts. Bowden also provided R.R. with hotel rooms and condoms to use during the commercial sex acts.

R.R. told Bowden she did not want to engage in commercial sex acts, but Bowden used violence and threats of violence to continue to cause her to engage in commercial

¹ The crimes of violence that Gregory Bowden committed in this case were: (1) sex trafficking through force, fraud or coercion 18 U.S.C. § 1591(a) and (b)(1) and (2) aggravated assault under Texas Penal Code ' 22.02(a)(1) against victim R.R.

The elements of sex trafficking are: 1) that the defendant knowingly recruited, enticed, harbored, transported, provided, obtained or maintained by any means R.R.; 2) that the defendant committed such act knowing or in reckless disregard of the fact that force, threats of force, fraud and coercion, or any combination of such means, would be used to cause R.R. to engage in a commercial sex act; and 3) that the defendant's acts were in or affected interstate commerce. Likewise, one commits aggravated assault by intentionally, knowingly or recklessly causing serious bodily injury to another person.

Bowden admits he committed each of the essential elements of sex trafficking through force, fraud or coercion and aggravated assault in this case.

² In this case the unlawful activity Gregory Bowden furthered was a criminal enterprise involving compelling prostitution, which is a violation of Texas Penal Code Section ' 43.05.

sex acts. Bowden intentionally caused R.R. serious bodily injury in furtherance of his unlawful commercial sex enterprise.

Accordingly, Bowden admits that from on or about February 1, 2014 through on or about December 19, 2014, the exact dates being unknown, in the Dallas Division of the Northern District of Texas and elsewhere, he used facilities in interstate commerce, namely cellular phones, hotels and the internet, with the intent to commit a crime of violence to further an unlawful activity, that is a business enterprise involving prostitution in violation of Texas Penal Code Sec. 43.05, and thereafter committed and attempted to commit the crimes of violence, to wit: a violation of 18 U.S.C. § 1591(a) and (b)(1), sex trafficking through force, fraud or coercion of victim R.R., and a violation of Tex. Pen. Code § 22.02(a)(1), aggravated assault of victim R.R., to further such unlawful activity. Finally, Bowden admits that his conduct violated 18 U.S.C. " 1952(a)(2) and (B) and the above facts are true and correct.

Cara Foos Pierce
CARA FOOS PIERCE
Assistant United States Attorney


GREGORY BOWDEN
Defendant

12-19-18
Date


BRADY W. WYATT
Attorney for Defendant

12-19-18
Date